

**GERRARD, COX & LARSEN**  
 2450 St. Rose Parkway, Suite 200  
 Henderson, Nevada 89074  
 (702) 796-4000

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 Fredrick J. Biedermann, Esq.  
 Nevada Bar No. 11918  
[fbiedermann@gerrard-cox.com](mailto:fbiedermann@gerrard-cox.com)  
**GERRARD, COX & LARSEN**  
 2450 St. Rose Pkwy., Suite 200  
 Henderson, NV 89074  
 Telephone: (702) 796-4000  
*Attorneys for Defendants*  
*2014-1 IH Equity Owner, LP*  
*THR Nevada II, LP, THR Property Borrower, LP,*  
*THR Property Guarantor, LP,*  
*THR Property Holdco, LP, and*  
*2014-1 IH Property Holdco, LP*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAS VEGAS DEVELOPMENTAL GROUP, LLC, a  
 Nevada limited liability company

Plaintiff,

vs.

2014-3 IH EQUITY OWNER, LP, a Delaware  
 limited partnership; BANK OF AMERICA, na,  
 National Banking Association; MERIDIAN  
 FORECLOSURE SERVICE, a California  
 Corporation; ARNOLD DUMLAO, an individual;  
 JOCELYN DILAG, an individual; THR NEVADA  
 II, LP, a Delaware limited partnership; THR  
 PROPERTY BORROWER, LP, a Delaware limited  
 partnership; THR PROPERTY GUARANTOR, LP,  
 a Delaware Limited partnership; THR PROPERTY  
 HOLDCO, LP, a Delaware limited partnership;  
 2014-3 IH PROPERTY HOLDCO, LP, a Delaware  
 limited partnership, 2014-1 IH BORROWER, LP, a  
 Delaware limited partnership; GERMAN  
 AMERICAN CAPITAL CORPORATION, a  
 Maryland corporation; DOE individuals I through  
 XX; and ROE CORPORATIONS I through XX,

Defendants.

Case No.: 2:15-cv-00917-GMN-NJK

**STIPULATION TO CONTINUE  
 TRIAL DATE**

**[ECF NO. 150]**

*FIRST REQUEST*

Defendants 2014-3 IH BORROWER, LP, a Delaware limited partnership 2014-3 IH  
 EQUITY OWNER, LP, a Delaware limited partnership; THR NEVADA II, LP, a Delaware  
 limited partnership; THR PROPERTY BORROWER, LP, a Delaware limited partnership; THR  
 PROPERTY GUARANTOR, LP, a Delaware Limited partnership; THR PROPERTY HOLDCO,

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1 LP, a Delaware limited partnership; and 2014-3 IH PROPERTY HOLDCO, LP, a Delaware  
2 limited partnership, (referred to collectively as “Invitation Homes Defendants”), BANK OF  
3 AMERICA, N.A. (“BANA”), and Plaintiff LAS VEGAS DEVELOPMENT GROUP, LLC, by  
4 and through their respective counsel of record, do hereby hereby stipulate and agree as follows:

5 1. On August 27, 2021, this Court entered an Minute Order In Chambers [ECF No.  
6 146] setting a Master Trial Scheduling Conference for September 27, 2021 before United States  
7 District Judge Andrew P. Gordon to set a trial date for the October 18/October 19 stack.

8 2. The parties believed that they would be able to appear at this Scheduling  
9 Conference and find a trial date which worked for all parties.

10 3. As all trials were pushed back for the last eighteen months due to COVID, the  
11 parties have extremely packed trial calendars as all state and federal courts are simultaneously  
12 trying to move the backlog of cases on their dockets.

13 4. As a result of crowded calendars, the parties anticipated working out a trial date at  
14 the Scheduling Conference.

15 5. On September 22, 2021, this Court entered an Minute Order In Chambers [ECF  
16 No. 149] indicating that the Joint Pre-Trial Order [ECF No. 145] incorrectly set this matter for a  
17 jury trial when no jury demand has been filed. Since this case is set for a bench trial, the Court  
18 vacated the Master Trial Scheduling Conference and set the above referenced matter for a trial  
19 date commencing on Monday, October 18, 2021.

20 6. Gerrard Cox Larsen, counsel for most of the Defendants, already has two state  
21 court trials scheduled in October and one scheduled for the first week of November.

22 7. In addition, Douglas D. Gerrard, Esq., lead attorney, for these Defendants will be  
23 out of country on the week of October 18, 2021 to October 22, 2021 for a trip planned and paid  
24 for more than a year ago.

25 8. The parties have met and conferred with each other and with this Court’s deputy  
26 courtroom clerk to find a date which works for the Court and for all counsel and they have  
27 determined that January 24, 2022 works for all parties and the Court.  
28

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9. Based upon the foregoing, the parties hereto stipulate and request that the trial date currently set for October 18, 2021 be continued to **January 24, 2022** and that the Court set a new calendar call date pursuant to the new trial date.

10. This Stipulation is made in good faith and not for purpose of delay.

Dated this 24<sup>th</sup> day of September, 2020. Dated this 24<sup>th</sup> day of September, 2020.

**GERRARD COX LARSEN**

**AKERMAN, LLP**

*/s/ Douglas D. Gerrard, Esq.*

*/s/ Melanie Morgan, Esq.*

Douglas D. Gerrard, Esq. (4613)  
Fredrick J. Biedermann, Esq. (11918)  
2450 Saint Rose Pkwy., Suite 200  
Henderson, Nevada 89074  
*Attorneys for Defendants /Crossclaimants  
THR Nevada II, THR Property Borrower  
THR Property Guarantor, THR Property  
Holdco and 2014-1 IH Property Holdco*

Melanie Morgan, Esq. (8215)  
Scott R. Lachman, Esq. (12016)  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
*Attorneys for Defendant  
Bank of America, N.A.*

Dated this 24<sup>th</sup> day of September, 2020.

Dated this 24<sup>th</sup> day of September, 2020.

**ROGER P. CROTEAU &  
ASSOCIATES, LTD.**

**HUTCHISON & STEFFEN, PLLC**

*/s/ Timothy E. Rhoda, Esq.*

*/s/ Todd Prall, Esq.*

Roger P. Croteau, Esq. (4958)  
Timothy E. Rhoda, Esq. (7878)  
2810 W. Charleston Blvd. #75  
Las Vegas, NV 89102  
*Attorneys for Plaintiff  
Las Vegas Development Group, LLC*

John T. Steffen, Esq. (4390)  
Todd Prall, Esq. (9154)  
Peccole Professional Park  
10080 West Alta Drive, Suite 200  
Las Vegas, NV 89145  
*Attorneys for Defendant 2014-3 IH Borrower*


**ORDER**

Based on the foregoing:

**IT IS HEREBY ORDERED** that the above Stipulation to Continue Trial Date to January 24, 2022 is **GRANTED**.

**IT IS SO ORDERED.**

Dated this 27 day of September, 2021

  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

**GERRARD, COX & LARSEN**  
2450 St. Rose Parkway, Suite 200  
Henderson, Nevada 89074  
(702) 796-4000

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of GERRARD COX LARSEN, and that on the 30<sup>th</sup> day of April, 2020 and pursuant to Fed. R. Civ. P. 5, I e-served a true and correct copy of the **STIPULATION TO CONTINUE TRIAL DATE** via the Federal Courts CM/ECF Filing System, and served the following parties addressed as follows:

Roger Croteau, Esq.  
Timothy Rhoda, Esq.  
ROGER P. CROTEAU & ASSOCIATES, LTD.  
Email: [croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Plaintiff*  
*Las Vegas Development Group, LLC*

John Steffen, Esq.  
Todd W. Prall, Esq.  
HUTCHISON & STEFFEN  
Email: [jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)  
Email: [tprall@hutchlegal.com](mailto:tprall@hutchlegal.com)  
*Attorneys for Defendants,*  
*2014-3IH BORROWER, LP*

Ariel Stern, Esq.  
Scott Lachman, Esq.  
AKERMAN, LLP  
Email: [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)  
Email: [darren.brenner@akerman.com](mailto:darren.brenner@akerman.com)

*Attorneys for Defendant Bank of America, N.A.*

-

  
\_\_\_\_\_  
Kanani Gonzales, an employee of  
GERRARD COX & LARSEN

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Sent from my iPhone

Begin forwarded message:

**From:** Tim Rhoda <tim@croteaulaw.com>  
**Date:** September 24, 2021 at 11:05:12 AM MST  
**To:** Fredrick Biedermann <fbiedermann@gerrard-cox.com>, melanie.morgan@akerman.com  
**Cc:** tprall@hutchlegal.com, CroteauLaw <croteaulaw@croteaulaw.com>, Doug Gerrard <DGerrard@gerrard-cox.com>, ariel.stern@akerman.com, lilith.xara@akerman.com, scott.lachman@akerman.com, jsteffen@hutchlegal.com  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Yes, it's good to go.

Tim

---

**From:** Fredrick Biedermann [mailto:FBiedermann@gerrard-cox.com]  
**Sent:** Friday, September 24, 2021 10:45 AM  
**To:** melanie.morgan@akerman.com  
**Cc:** tprall@hutchlegal.com; Tim Rhoda; CroteauLaw; Doug Gerrard; ariel.stern@akerman.com; lilith.xara@akerman.com; scott.lachman@akerman.com; jsteffen@hutchlegal.com  
**Subject:** Re: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Thank you Melanie.

Tim, are you good with the changes I made? Can I add your e-signature?

Fredrick Biedermann, Esq.  
Gerrard Cox Larsen

Sent from my iPhone

On Sep 24, 2021, at 10:22 AM, melanie.morgan@akerman.com wrote:

Hi Fredrick,

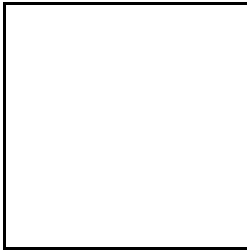
No changes here. You have approval to file with my electronic signature.

Thanks,

**Melanie Morgan**

Partner, Consumer Financial Services Practice Group  
Akerman LLP | 1635 Village Center Circle, Suite 200 | Las Vegas, NV 89134  
D: 702 634 5005  
Admitted to Practice in Nevada and Texas  
[melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com)

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---

**From:** Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>

**Sent:** Thursday, September 23, 2021 9:56 PM

**To:** Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>; 'Tim Rhoda' <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; Stern, Ariel (Ptnr-Las) <[ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)>; Xara, Lilith (Assoc-Las) <[lilith.xara@akerman.com](mailto:lilith.xara@akerman.com)>; Lachman, Scott (Assoc-Las) <[scott.lachman@akerman.com](mailto:scott.lachman@akerman.com)>; Morgan, Melanie (Ptnr-Las) <[melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com)>; John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>

**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

[External to Akerman]

This is fine. You can affix my e-signature.

---

**From:** Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>

**Sent:** Thursday, September 23, 2021 5:46 PM

**To:** 'Tim Rhoda' <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>; Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>

**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Thank you, Tim –

I made the correction you requested. I added language in the stipulation that the parties request that the Court set a new calendar call date.

Best regards,

---

**Fredrick J. Biedermann, Esq.**  
GERRARD COX LARSEN  
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---

**From:** Tim Rhoda <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>  
**Sent:** Thursday, September 23, 2021 5:25 PM  
**To:** Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>; 'Todd W. Prall' <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

This is generally okay with me, but should it provide for a calendar call date, etc. Also, please correct my office address to 2810 W. Charleston Blvd., #75, Las Vegas, NV 89102.

Tim

---

**From:** Fredrick Biedermann [<mailto:FBiedermann@gerrard-cox.com>]  
**Sent:** Thursday, September 23, 2021 3:40 PM  
**To:** 'Todd W. Prall'; Tim Rhoda; CroteauLaw; Doug Gerrard; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Counsel –

Attached is a Stipulation and Order to Continue the trial date set for October 18, 2021 to January 24, 2022. At your earliest convenience, please review and let me know if I may add your e-signature to the stipulation.

Thank you!

Best regards,

---

**Fredrick J. Biedermann, Esq.**  
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2450 St. Rose Parkway, Suite 200

Henderson, Nevada 89074  
702-796-4000-Telephone  
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**From:** Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>  
**Sent:** Thursday, September 23, 2021 1:16 PM  
**To:** Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>; 'Tim Rhoda' <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Yes. January 24, 2022 works for us as well.

---

**From:** Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>  
**Sent:** Thursday, September 23, 2021 12:40 PM  
**To:** 'Tim Rhoda' <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>; Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Tim and Todd –

Are you both available to do this trial on January 24, 2022 ?

Best regards,

---

**Fredrick J. Biedermann, Esq.**  
**GERRARD COX LARSEN**  
2450 St. Rose Parkway, Suite 200  
Henderson, Nevada 89074  
702-796-4000-Telephone  
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---

**From:** Tim Rhoda <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>  
**Sent:** Thursday, September 23, 2021 11:46 AM  
**To:** Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>; Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

If November 1 works for Akerman, I think we can make it work as well. We do have a state court trial scheduled to commence on a 2 week stack beginning on November 1. However, we can presumably work around that one if this is scheduled as a firm date.

Tim

---

**From:** Todd W. Prall [<mailto:TPrall@hutchlegal.com>]  
**Sent:** Thursday, September 23, 2021 11:30 AM  
**To:** Fredrick Biedermann; Tim Rhoda; CroteauLaw; Doug Gerrard; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

November 1 works for us.

---

**From:** Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>  
**Sent:** Thursday, September 23, 2021 11:28 AM  
**To:** 'Tim Rhoda' <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>; Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>  
**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Counsel –

Are you all available to move the trial to November 1, 2021?

I will put together a Stipulation and Order today. Please respond at your earliest convenience.

Best regards,

---

**Fredrick J. Biedermann, Esq.**

**GERRARD COX LARSEN**

2450 St. Rose Parkway, Suite 200

Henderson, Nevada 89074

702-796-4000-Telephone

702-796-4848-Facsimile

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---

**From:** Tim Rhoda <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>

**Sent:** Thursday, September 23, 2021 11:12 AM

**To:** Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>; Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>; CroteauLaw <[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)>; Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>

**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

No problem here with working to find a mutually agreeable date.

Tim

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**From:** Todd W. Prall [<mailto:TPrall@hutchlegal.com>]

**Sent:** Thursday, September 23, 2021 8:40 AM

**To:** Fredrick Biedermann; CroteauLaw; Doug Gerrard; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen; Tim Rhoda

**Subject:** RE: 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Fred.

We are happy to accommodate. My schedule is generally open during in November up to the week of Thanksgiving. I would advise getting a stipulation on as soon as possible. Please prepare one for us to review.

---

**From:** Fredrick Biedermann <[FBiedermann@gerrard-cox.com](mailto:FBiedermann@gerrard-cox.com)>  
**Sent:** Wednesday, September 22, 2021 5:32 PM  
**To:** [croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com); Doug Gerrard <[DGerrard@gerrard-cox.com](mailto:DGerrard@gerrard-cox.com)>; [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com); [lilith.xara@akerman.com](mailto:lilith.xara@akerman.com); [scott.lachman@akerman.com](mailto:scott.lachman@akerman.com); [melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com); John T. Steffen <[jsteffen@hutchlegal.com](mailto:jsteffen@hutchlegal.com)>; Todd W. Prall <[TPrall@hutchlegal.com](mailto:TPrall@hutchlegal.com)>; Tim Rhoda ([tim@croteaulaw.com](mailto:tim@croteaulaw.com)) <[tim@croteaulaw.com](mailto:tim@croteaulaw.com)>  
**Subject:** 15118 - FW: Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing - STIPULATION TO CONTINUE TRIAL

Counsel –

As you saw by the email below, the Court set a firm trial date in the above referenced matter. We need to move this trial date to sometime in November as Doug will be out of the country on the week of October 18. When Doug responded to the Court the other day that we were ready for trial, it was his understanding that we would discuss setting a trial date at the September 27, 2021 hearing. Will you all Stipulate to move this trial to November or December? And if so, what weeks in November and December are you all available?

Please respond at your earliest convenience as we have until October 11, 2021 to file a stipulation with the court to continue to the trial date.

Best regards,

---

**Fredrick J. Biedermann, Esq.**  
**GERRARD COX LARSEN**  
2450 St. Rose Parkway, Suite 200  
Henderson, Nevada 89074  
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**From:** [cmecf@nvd.uscourts.gov](mailto:cmecf@nvd.uscourts.gov) <[cmecf@nvd.uscourts.gov](mailto:cmecf@nvd.uscourts.gov)>  
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**To:** [cmecfhelpdesk@nvd.uscourts.gov](mailto:cmecfhelpdesk@nvd.uscourts.gov)  
**Subject:** Activity in Case 2:15-cv-00917-GMN-NJK Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al Minute Order Setting Hearing

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United States District Court

District of Nevada

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The following transaction was entered on 9/22/2021 at 2:38 PM PDT and filed on 9/22/2021

**Case Name:** Las Vegas Development Group, LLC v. 2014-3 IH Equity Owner, LP et al

**Case Number:** [2:15-cv-00917-GMN-NJK](#)

**Filer:**

**Document Number:** 149(No document attached)

**MINUTE ORDER IN CHAMBERS of the Honorable Judge Gloria M. Navarro on 9/22/2021. By Deputy Clerk: Aaron Blazeovich.**

**On February 18, 2021, the Court entered the [145] Joint Pretrial Order and this matter was incorrectly set for a jury trial when no jury demand has been filed. Since this case is set for a bench trial, there is no need for the parties to appear at the Master Trial Scheduling Conference before Judge Gordon. Accordingly, IT IS HEREBY ORDERED that the Master Trial Scheduling Conference set for 9/27/2021 at 10:00 a.m. is VACATED. IT IS FURTHER ORDERED that Calendar Call is set for 10/12/2021 at 9:00 a.m. in Courtroom 7D before Judge Gloria M. Navarro and Bench Trial is set for 10/18/2021 at 8:30 a.m. in Courtroom 7D before Judge Gloria M. Navarro.**

**(no image attached) (Copies have been distributed pursuant to the NEF - ASB)**

**2:15-cv-00917-GMN-NJK Notice has been electronically mailed to:**

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**2:15-cv-00917-GMN-NJK Notice has been delivered by other means to:**

Christiana Trust

German American Capital Corporation

Todd W. Prall  
Senior Counsel



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Todd W. Prall  
Senior Counsel

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Todd W. Prall  
Senior Counsel

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